

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

	)	
SYNOPSYS, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:21-cv-00252
	)	
RISK BASED SECURITY, INC.,	)	
	)	
Defendant.	)	
	)	

**SYNOPSYS’ RENEWED MOTION FOR FEES AND COSTS**

Pursuant to Rule 54 of the Federal Rules of Civil Procedure and the Court’s October 7, 2022 Order, (ECF No. 438), Synopsys, Inc. (“Synopsys”) respectfully moves the Court for an award of its reasonable attorneys’ fees and non-taxable costs in this action. An award of attorneys’ fees and costs is warranted here because Synopsys is the prevailing party against Defendant Risk Based Security, Inc. (“RBS”). As the prevailing party, Synopsys is entitled to an award of reasonable fees and costs under the Reseller Agreement between RBS and Synopsys’ subsidiary, Black Duck Software, Inc. Synopsys is also entitled to an award of its reasonable attorneys’ fees under the Defend Trade Secrets Act (“DTSA”) and Virginia Uniform Trade Secrets Act (“VUTSA”) because RBS pursued its allegations of trade secret misappropriation in bad faith.

For these reasons, which are set out in more detail in the brief and supporting declarations being filed with this motion, Synopsys respectfully requests an award of \$4,779,364.51 in attorneys’ fees and \$461,413.54 in non-taxable costs.

Dated: July 28, 2023

Respectfully submitted,

/s/ N. Thomas Connally

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